

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

DEBORAH A. WILLIAMS

CASE 17-12464

DEBTOR

CHAPTER 13

Judge Jeffery P. Hopkins

IN RE:

DEBORAH A. WILLIAMS

248 Baxter Ave

Cincinnati, Ohio 45220

ADVERSARY #18-01001

PLAINTIFF

VS

City of Cincinnati

c/o City Solicitor

801 Plum Street, 214 City Hall

Cincinnati, Ohio 45202

Lot King Development Co. dba Affordable

5966 Stewart Road

Cincinnati, Ohio 45227

M&T Bank

PO Box 840

Buffalo, NY 14240

Seterus

PO Box 1077

Hartford, CT 06143

State of Ohio

Department of Taxation

PO Box 530

Columbus, Ohio 43266

Internal Revenue Service

PO Box 7346

Philadelphia, PA 19101-7346

**Ohio Dept of Taxation
30 E. Broad Street, 21st Floor
Columbus, Ohio 43215**

**Advantage Funding Commercial Capital
1111 Marcus Ave
Lake Success, NY 11042**

**Cincinnati Water Works
Bankruptcy Desk
4747 Spring Grove Ave
Cincinnati, Ohio 45232**

**Duke Energy
139 E. 4th Street
Atrium II, 25th Floor
PO Box 960
Attn: Tanya Schweitzer, Legal Dept
Cincinnati, Ohio 45202**

**GM Financial
6400 Main Street #201
Buffalo, NY 14221**

**Good Samaritan Hospital
Patient Accounts
619 Oak Street
Cincinnati, Ohio 45206**

**Qualified Emergency Specialists
1472 Solutions Center
Chicago, IL 60677-1044**

**TriHealth Physicians
PO Box 636556
Cincinnati, Ohio 45263**

Defendants

Also Serve:

**Office of the District Counsel
312 Elm Street #2350
Cincinnati, Ohio 45202**

**US Attorney
221 E. Fourth Street #400
Cincinnati, Ohio 45202**

**Ohio Attorney General
30 E Broad Street
14th Floor
Columbus, Ohio 43215**

**Scott Gilbert
8135 Cabinet Circle
Cincinnati, Ohio 45244**

**Douglas Haessing
Reimer Arnovitz Chernek & Jeffrey Co
PO Box 39696
Solon, Ohio 44139**

**Manley Deas & Kochalski LLC
PO Box 16508
Columbus, Ohio 43216**

MOTION FOR DEFAULT JUDGMENT

Comes now the Plaintiff and hereby moves for a Default Judgment in the within Adversary. This motion is supported by the attached Memorandum.

/s/ Eric W. Goering
Eric W. Goering 0061146
220 W. Third Street
Cincinnati, Ohio 45202
(513)621-0912

MEMORANDUM

Debtor filed a Chapter 13 Bankruptcy on July 5, 2017. The within Adversary was commenced on January 5, 2018. Notices were sent by the Plaintiff and by the Court to all interested parties. The Debtor entered into Agreed orders with Park National Bank and Santander Consumer USA Inc. and default is not requested against either party. To date, no Answers have been filed by any of the parties.

WHEREFORE, Plaintiff moves for a Default Judgment on the Complaint
For Equitable Relief to Reinstate the Automatic Stay Under 11 USC 362.

/s/ Eric W. Goering
Eric W. Goering

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

**IN THE MATTER OF:
DEBORAH A. WILLIAMS**

**NO: 17-12464
CHAPTER 13**

Debtor

**ADV# 18-1001
Judge Jeffery P. Hopkins**

NOTICE OF MOTION FOR DEFAULT JUDGMENT

Attorney for Debtor has entered a Motion for Default Judgment.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion/objection, then on or before twenty-one (21) days from the date set forth in the certificate of service for the motion/objection, you must file with the court a response explaining your position by mailing your response by regular U.S. Mail to:

Clerk, U.S. Bankruptcy Court
Atrium Two, Suite 800
221 E. Fourth St.
Cincinnati, Ohio 45202

OR your attorney must file a response using the court's ECF System.

Date: 03/23/18

The court must receive your response on or before the date above.

You must also send a copy of your response either by

- 1) the court's ECF System or by
- 2) regular U.S. Mail to:

Goering & Goering
220 West Third Street
Cincinnati, Ohio 45202

Margaret A. Burks
Chapter 13 Trustee
600 Vine Street #2200
Cincinnati, OH 45202

U. S. Trustee
36 E. 7th St.
Cincinnati, Ohio 45202

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in this motion/objection and may enter an order granting the relief

Date: 03/01/18

GOERING & GOERING
Attorneys for Debtor
220 West Third Street
Cincinnati, Ohio 45202
(513) 621-0912

/s/ Eric W. Goering
Eric W. Goering

CERTIFICATE OF SERVICE

I hereby certify that on March 1, 2018 a copy of the foregoing Motion for Default Judgment was served on the following registered ECF participants electronically through the court's ECF System at the email address registered with the court:

U.S. Trustee
Margaret A. Burks
Susan Argo
Branson D. Dunlop
John Jansing
Cynthia A. Jeffrey
Peter Michael O'Grady
Raymond J Pikna, Jr.

And on the following by ordinary U.S. Mail addressed to:

City of Cincinnati
c/o City Solicitor
801 Plum Street, 214 City Hall
Cincinnati, Ohio 45202

Lot King Development Co. dba Affordable
5966 Stewart Road
Cincinnati, Ohio 45227

M&T Bank
PO Box 840
Buffalo, NY 14240

Park National Bank
720 East Pete Rose Way #100
Cincinnati, Ohio 45202

Santander
PO Box 560284
Dallas, TX 75356

Seterus
PO Box 1077
Hartford, CT 06143

State of Ohio
Department of Taxation
PO Box 530
Columbus, Ohio 43266

Internal Revenue Service
PO Box 7346
Philadelphia, PA 19101-7346

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PO Box 39696
Solon, Ohio 44139

Susan Argo
312 Walnut Street #1800
Cincinnati, Ohio 45202

John Jansing
Altick & Corwin
One South Main Street #1590
Dayton, Ohio 45402

Manley Deas & Kochalski LLC
PO Box 16508
Columbus, Ohio 43216

/s/ Eric W. Goering
Eric W. Goering